ISSUES REGARDING USE OF THE CARBOB MODEL

1. Will the CARBOB model work only with CaRFG3, or with CaRFG2 as well?

2. The CARBOB model is necessarily premised on a particular slate of denatured ethanol specs. What should those be? "Worst case?" Mid-range?

3. Similarly, what specifications if any should be set for the denatured ethanol used to determine CARBOB compliance with the CaRFG standards when handblending is used? (Reg. now requires use of "representative" ethanol.)

4. Should a refiner be permitted to selecting a cleaner set of denatured ethanol specs than those identified in the regulations? If so, how would that work with the CARBOB model and handblending situations?

5. At least in the situation where the refiner has selected a cleaner set of ethanol specs, should the refiner be required to maintain, and provide to ARB inspectors upon request, quantities of that ethanol that can be used in handblending enforcement? Should this be required where the "default" specs for denatured ethanol are used?

6. When the CARBOB model is used, should it be premised on adding the minimum amount of oxygenate added within the specified range, or the mid-range? Note that the handblending provisions now require that the minimum amount of ethanol be added.

7. Should the requirement that refiners sample and test all batches of CARBOB be retained, even though refiners do not have to test final blends of CaRFG except for properties being averaged?

8. Can and should the CARBOB model be used to establish cap limits for downstream CARBOB, so that handblending would not be necessary for downstream enforcement (but retained as an option)? Have the regulation identify specific cap limits for CARBOB designed for oxygen at the common expected ranges (1.8-2.2 and 2.5-2.9 wt.%)? Include a mechanism for identifying the CARBOB cap limits for other specified ranges?

9. Where a refiner has *not* elected to use the CARBOB model, should ARB inspectors be permitted test the CARBOB and determine whether its slate of specs will pass using the CARBOB model?